

# **EXHIBIT 2**



Nathan B. Webb

Direct Phone: 330.208.4588  
Direct Fax: 330.208.4594  
Email: nwebb@hahnlaw.com

February 15, 2021

Christina J. Moser, Esq.  
Baker Hostetler  
Key Tower, 127 Public Square  
Suite 2000  
Cleveland, OH 44114

**Re: *Drips Holdings, LLC v. Teledrip LLC***

Christina,

Thank you for speaking with me last week. As we are nearing depositions, it is apparent that the way that Drips has produced documents is preventing us from preparing our clients for a deposition and will not allow witnesses to fully and fairly understand and respond to Drips' claims. In order to address these issues, we request you address the following issues with Drips' document production:

1. Drips has not produced a legible copy of its workflow. For example, the image of page 6 of Drips' Responses to Defendant's Second Set of Interrogatories, DRIPS033265 and DRIPS033276 are all illegible and cannot be zoomed in. We cannot assess Drips' copying claims if we cannot see what was allegedly copied. We request that you produce a legible copy of your workflow.
2. Drips has not produced its documents with metadata. We cannot assess when Drips' marketing material was created without the metadata. We request that you produce all of the documents identified in your Responses to Defendant's Second Set of Interrogatories with metadata.
3. Drips has continued to label almost all of its documents attorneys' eyes only. Drips insists that Teledrip copied its marketing material and workflow, yet labels all of those documents attorney's eyes only. If, as you allege, our client has already seen and copied those materials, why would they need to be labeled attorney's eyes only? There should be no need to prevent Teledrip from seeing documents that Drips alleges it has already seen. We cannot fairly prepare our client for a deposition that alleges that he copied material if he is not allowed to see that material. Moreover, it is inherently unfair and prejudicial to go to trial while denying litigants the right to address specifically what they are accused of copying. We request that you de-designate all of the documents identified in your Responses to Defendant's Second Set of Interrogatories from attorneys' eyes only to confidential.

Nathan B. Webb

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HAHN LOESER & PARKS LLP attorneys at law

cleveland columbus naples fort myers san diego chicago

200 Public Square, Suite 2800 Cleveland, Ohio 44114 phone 216.621.0150 fax 216.241.2824 hahnlaw.com